

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:07-cr-0284-WKW
)	
WILLIAM EARL HUNT,)	
)	
Defendant.)	

MOTION FOR ISSUANCE OF SUBPOENAS

COMES NOW the defendant, William Earl Hunt, pursuant to Rule 17 (a)(b) and (c) of the Federal Rules of Criminal Procedure and 18 U.S.C. § 3006A (e)(1), and respectfully moves this Honorable Court for an Order permitting the issuance of the following requested subpoenas and requiring the costs of the witnesses' transportation, subsistence and witness fees be paid at Government expense.

Defendant, pursuant to Rule 17 (a)(b) and (c), Federal Rules of Criminal Procedure, requests the issuance by this Court of an Order requiring service of the following subpoena at the Government expense upon:

1. Deputy David Slay
Elmore County Sheriff's Department
100 East Commerce Street
Wetumpka, AL 36092
(334) 567-1156

2. Agent Ronald Briggum
Central Ala Drug Task Force (CADTF)
239 Jennett Barrett Blvd.
Wetumpka, AL 36092

3. Agent Joe Black
Central Ala Drug Task Force (CADTF)
239 Jennett Barrett Blvd.
Wetumpka, AL 36092

Said subpoena should require the above-named witnesses to appear and testify at the suppression hearing in the United States District Court for the Middle District of Alabama, One Church Street, Montgomery, Alabama, on July 8, 2008, at 10:00 A.M. in courtroom 5A.

In further support hereof, the defendant shows the following:

1. The defendant was adjudged indigent under the provision of the Criminal Justice Act of 1964, and the undersigned was appointed to represent him.
2. The testimony of the witnesses is material to preparing a defense in that they will testify to the facts and circumstances surrounding the allegations against the defendant.

WHEREFORE, Defendant respectfully requests that this Motion be granted and the Court issue an order requiring service of subpoena by the U.S. Marshal upon the aforementioned witnesses, with witness fees and costs of transportation and subsistence to be provided at Government expense.

Dated this 2nd day of July, 2008.

s/ Richard K. Keith
RICHARD K. KEITH (KEI003)
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CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Susan R. Redmond, AUSA
Post Office Box 197
Montgomery, AL 36101-0197

s/ Richard K. Keith

OF COUNSEL